

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Louis Darrell Harper, Sr.
Betty Denise Harper, Debtors**

**Case No. 19-03880-JAW
Chapter 13**

**DEBTOR'S CERTIFICATION AND MOTION FOR ENTRY OF CHAPTER 13
DISCHARGE PURSUANT TO 11 U.S.C. §1328 (a) and (h)**

This motion seeks an order discharging the debtor(s) pursuant to § 1328(a) of the bankruptcy code. If you oppose this motion, you must file a response with the court within twenty-one (21) days from the date listed below in the certificate of service. Your response must set forth the specific factual allegations with which you disagree, and a copy of your response must be served on the debtor(s) and debtor's(s') attorney. If no timely response is filed, the court may grant this motion without holding a hearing. A timely response is necessary for a hearing to be held.

1. By signing below, the debtors certify under penalty of perjury that the following statements are true and correct:
 - A. For cases filed on or after March 10, 2008, we have completed a personal financial management instructional course provided through an agency approved by the United States Trustee and have filed the certificate of completion provided by the course provider (in a joint case, both husband and wife must each complete the course and file a certificate of completion) or the approved personal financial management course provider has notified the court that we have completed a post-petition instructional course concerning personal financial management. **11 U.S.C. § 1328(g)**
 - B. All pre-petition amounts owed by me on domestic support obligation ("Domestic Support Obligation" as defined at 11 U.S.C §101(14A)), if any, have been paid to the extent provided by the plan. All post-petition amounts owed by me on a domestic support obligation, if any, have been paid. **11 U.S.C §1328(a)**
 - C. We have not received a discharge under chapter 7, 11 or 12 of the Bankruptcy Code in a prior case filed during the four-year period preceding the date that the petition was filed in this case. **11 U.S.C. §1328(f)(1)**
 - D. We have not received a discharge under chapter 13 of the Bankruptcy Code in a prior case filed during the two-year period before the date that the petition was filed in this case. **11 U.S.C. §1328(f)(2)**
 - E. We have not been convicted of a felony, the circumstances of which would demonstrate that the filing of this bankruptcy case constituted an abuse of the provisions of the Bankruptcy Code. **11 U.S.C. §1328(h)(1) and §522(q)(1)(A)**
 - F. If we owe a debt arising from: (i) any violation of any State or Federal securities laws, regulations or orders, (ii) fraud, deceit or manipulation in a fiduciary capacity or in connection with the purchase or sale of any security, (iii) a civil remedy under 1964 of Title 18 of the United States Code, or (iv) that caused serious injury or death to another individual in the preceding five (5) years, in the preceding five (5) years, then we have not claimed an exemption for my/our residence in an amount in excess of the statutory

cap as prohibited by §522(q)(1) of the Bankruptcy Code. **11 U.S.C. §1328(h)(1) and §522(q)(1)(B)**

G. No proceeding is pending in which we may be found guilty of a felony of the kind described in §522(q)(1)(A) or in which we may be found liable for a debt of the kind described in §522(q)(1)(B). **11 U.S.C. §1328(h)(2)**

H. We have made all payments required by my confirmed Chapter 13 plan.

2. Debtors hereby move the court for the entry of a discharge order in this case.

| | |
|--|-----------------------|
| Signed: <u>/s/ Louis Darrell Harper, Sr.</u> | <u>06-04-2025</u> |
| Louis Darrell Harper, Sr. | Date |
| <u>/s/ Betty Denise Harper</u> | <u>06-02-2025</u> |
| Betty Denise Harpe | Date |
| <u>/s/ Thomas C. Rollins, Jr.</u> | <u>06-04-2025</u> |
| Thomas C. Rollins, Jr., MS Bar No. 103469 | Date |
| Attorney for the Debtors | |
| The Rollins Law Firm, PLLC | |
| P.O. Box 13767 | |
| Jackson, MS 39236 | |
| 601.500.5533 | |

3. Mailing address for filing responses:

Jackson Office:
Danny L. Miller, Clerk
United States Bankruptcy Court
Thad Cochran US Courthouse
501 E Court St, Ste 2.300
Jackson, MS 39201

Gulfport Divisional Office:
Danny L. Miller, Clerk
United States Bankruptcy Court
Dan M. Russell, Jr. U.S. Courthouse
2012 15th St, Suite 244
Gulfport, MS 39501

CERTIFICATE OF SERVICE

On June 4, 2025, a copy of this pleading was served on each of the persons listed on the attached service list either by prepaid United States mail or via electronic service through the Court's EM/ECF system at the mailing addresses and/or email addresses indicated.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

LOUIS DARRELL HARPER, SR
BETTY DENISE HARPER

CASE NO: 19-03880

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 6/4/2025, I did cause a copy of the following documents, described below,
Notice and Motion for Entry of Chapter 13 Discharge

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 6/4/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

LOUIS DARRELL HARPER, SR
BETTY DENISE HARPER

CASE NO: 19-03880

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 6/4/2025, a copy of the following documents, described below,
Notice and Motion for Entry of Chapter 13 Discharge

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 6/4/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 19-03880
SOUTHERN DISTRICT OF MISSISSIPPI
WED JUN 4 12-13-0 PST 2025

(P)TRUSTMARK NATIONAL BANK
P O BOX 1928
BRANDON MS 39043-1928

~~EXCLUDE~~~~(U)US BANK TRUST NATIONAL ASSOCIATION~~

US BANK TRUST NATIONAL ASSOCIATION NOT
IN
ATTN BK DEPT 3501 OLYMPUS BLVD
DALLAS TX 75019-6156

~~EXCLUDE~~~~(U)VERITAS FEDERAL CREDIT UNION~~~~EXCLUDE~~

~~US BANKRUPTCY COURT
THAD COCHRAN US COURTHOUSE
501 E COURT STREET
SUITE 2300
JACKSON MS 39201-5036~~

AARONS
PO BOX 100039
KENNESAW GA 30156-9239

CAPITAL ONE
PO BOX 30281
SALT LAKE CITY UT 84130-0281

CAPITAL ONE BANK (USA) NA
BY AMERICAN INFOSOURCE AS AGENT
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
PO BOX 7346
PHILADELPHIA PA 19101-7346

DIRECTV LLC
BY AMERICAN INFOSOURCE AS AGENT
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

ENTERGY MISSISSIPPI
639 LOYOLA AVENUE
NEW ORLEANS LA 70113-3125

ENTERGY MISSISSIPPI LLC
CO JON MAJEWSKI
CREDIT COLLECTIONS
BLDG 1 L-JEF-359
4809 JEFFERSON HWY
JEFFERSON LA 70121-3122

FSNB NA
511 SW A AVE
LAWTON OK 73501-3927

FORT SILL NATIONAL BAN
511 SW A AVE
LAWTON OK 73501-3927

INTERNAL REVENUE SERVI
CO US ATTORNEY
501 EAST COURT ST
STE 4430
JACKSON MS 39201-5025

JAMES ELDRED RENFROE
RENFROE PERRILLOUX PLLC
FOR TRUSTMARK NATIONAL BANK
648 LAKE LAND EAST DRIVE SUITE A
FLOWOOD MS 39232-9574

JOHN S SIMPSON
ATTORNEY FOR VERITAS FEDERAL CREDIT
UNIO
SIMPSON LAW FIRM P A
P O BOX 1410
RIDGELAND MS 39158-1410

MS DEPT OF REVENUE
BANKRUPTCY SECTION
PO BOX 22808
JACKSON MS 39225-2808

MAGNOLIA FCU
240 BRIARWOOD DR
JACKSON MS 39206-3027

MISSISSIPPI DEPARTMENT OF REVENUE
BANKRUPTCY SECTION
POST OFFICE BOX 22808
JACKSON MS 39225-2808

(P)NISSAN MOTOR ACCEPTANCE CORPORATION
LOSS RECOVERY
PO BOX 660366
DALLAS TX 75266-0366

NISSAN MOTOR ACCEPTANCE
POB 660366
DALLAS TX 75266-0366

NISSAN OF NORTH AMERIC
PO BOX 685001
FRANKLIN TN 37068-5001

PROGRESSIVE LEASING
256 W DATA DR
DRAPER UT 84020-2315

SMITH ROUCHON
1456 ELLIS AVE
JACKSON MS 39204-2204

~~EXCLUDE~~

~~(D)SMITH ROUCHON
1456 ELLIS AVE
JACKSON MS 39204-2204~~

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

ST DOMINIC HOSPITAL
PO BOX 24056
JACKSON MS 39225-4056

TEXAS GUARANTEED STD
PO BOX 83100
ROUND ROCK TX 78683-3100

TRELLIS COMPANY
PO BOX 83100
ROUND ROCK TX 78683-3100

~~EXCLUDE~~

~~(D) (P) TRUSTMARK NATIONAL BANK
P O BOX 1928
BRANDON MS 39043-1928~~

~~EXCLUDE~~

~~(D) (P) TRUSTMARK NATIONAL BANK
P O BOX 1928
BRANDON MS 39043-1928~~

US BANK TRUST NATIONAL ASSOCIATION
SELENE FINANCE LP
ATTN BK DEPT
3501 OLYMPUS BLVD SUITE 500
DALLAS TX 75019-6295

US ATTORNEY GENERAL
US DEPT OF JUSTICE
950 PENNSYLVANIA AVENW
WASHINGTON DC 20530-0001

~~EXCLUDE~~

~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6430
JACKSON MS 39201-5022~~

VERITAS FEDERAL CREDIT UNION
PO BOX 2659
SMYRNA TN 37167-2686

BETTY DENISE HARPER
112 NORTHGATE DR
CANTON MS 39046-3159

~~EXCLUDE~~

~~HAROLD J BARKLEY JR
PO BOX 4476
JACKSON MS 39296-4476~~

DEBTOR

LOUIS DARRELL HARPER SR
112 NORTHGATE DR
CANTON MS 39046-3159

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236-3767~~